

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICAN,
Plaintiff,
vs.
NL INDUSTRIES, et al.,
Defendants,
and
CITY OF GRANITE CITY, ILLINOIS,
et al.
Intervenor/Defendants.

Civil Action No.
91 CV 00578-JLF

CITY OF GRANITE CITY'S
MOTION FOR LEAVE TO FILE MEMORANDUM
IN EXCESS OF PAGE LIMIT

COMES NOW Intervenor/Defendant, City of Granite City, Illinois ("City"), and moves that this Court grant it leave to file a Memorandum in Support of its Motion for Temporary Restraining Order and Preliminary Injunction in excess of the 20-page limitation set forth in Local Rule 5 of this Court.

The City's motion discusses and relies on detailed events that span more than six years. The action of the United States Environmental Protection Agency ("U.S. EPA") in the case must be carefully outlined in order for this Court to properly evaluate the merits of this motion.

Moreover, this case deals with complex factual and statutory arguments. Because the City is moving for a temporary restraining order and preliminary injunction, it must outline the site conditions, imminent harm posed by the U.S. EPA's action, and the merits of the underlying action. Determination of this motion



requires the consideration of statutory provisions, due process, U.S. EPA regulations, and substantial applicable caselaw. It is imperative the City be given the opportunity to adequately explain the bases and support for its positions.

WHEREFORE, in order to properly and adequately brief the Court on the facts and issues involved in the Motion for Temporary Restraining Order and Preliminary Injunction, the City requests leave to file its Memorandum in excess of 20 pages.

Respectfully submitted,

CITY OF GRANITE CITY, ILLINOIS
Intervenor/Defendant

BY: 

Edward C. Fitzhenry
City Attorney
Lueders, Robertson & Konzen
1939 Delmar Avenue
P. O. Box 735
Granite City, IL 62040
(618) 876-8500
ARDC No. 06180218

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ORDER

It is hereby ordered that the City of Granite City is granted leave to file its Memorandum in Support of its Motion for Temporary Restraining Order and Preliminary Injunction, in excess of twenty pages.

Honorable James L. Foreman

DATED:

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